

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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<b><i>IN RE RETAILMENOT BROWSER</i></b>	:	
<b><i>EXTENSION LITIGATION</i></b>	:	No. 1:25-cv-00783-JLR
	:	
	:	<b>ORAL ARGUMENT</b>
	:	<b>REQUESTED</b>
This Document Relates To: <i>All Cases</i>	:	
	:	
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**NOTICE OF MOTION TO DISMISS THE CONSOLIDATED CLASS ACTION  
COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, Defendants RetailMeNot, Inc. and Ziff Davis, Inc. respectfully move this Court before the Honorable Jennifer L. Rochon to dismiss the Consolidated Class Action Complaint (ECF No. 34) with prejudice pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6).

PLEASE TAKE FURTHER NOTICE that, pursuant to the Order dated April 18, 2025 (ECF No. 33), Plaintiffs' opposition papers, if any, are to be filed on or before August 29, 2025 and reply papers are to be filed on or before September 26, 2025.

Dated: July 25, 2025  
New York, New York

**GOODWIN PROCTER LLP**

By: /s/ Mark David McPherson

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*RetailMeNot, Inc. and Ziff Davis, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 25, 2025, a true and correct copy of the foregoing was electronically filed and served on all parties of record via the Court's CM/ECF system.

/s/ Mark David McPherson  
Mark David McPherson